

STATEMENT OF BASIS (AI No. 4174)

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0047554 to discharge to waters of the State of Louisiana.

THE APPLICANT IS: Sid Richardson Carbon Co.
Addis Plant
P.O. Box 267
Addis, LA 70710

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

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DATE PREPARED: December 28, 2005

1. PERMIT STATUS

A. Reason For Permit Action:

Proposed reissuance of an Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term following regulations promulgated at LAC 33:IX.2711/40 CFR 122.46*.

- * In order to ease the transition from NPDES to LPDES permits, dual regulatory references are provided where applicable. The LAC references are the legal references while the 40 CFR references are presented for informational purposes only. In most cases, LAC language is based on and is identical to the 40 CFR language. 40 CFR Parts 401-402, and 404-471 have been adopted by reference at LAC 33:IX.4903 and will not have dual references. In addition, state standards (LAC Chapter 11) will not have dual references.

LAC 33:IX Citations: Unless otherwise stated, citations to LAC 33:IX refer to promulgated regulations listed at Louisiana Administrative Code, Title 33, Part IX.

40 CFR Citations: Unless otherwise stated, citations to 40 CFR refer to promulgated regulations listed at Title 40, Code of Federal Regulations in accordance with the dates specified at LAC 33:IX.4901, 4903, and 2301.F.

B. NPDES permit - NPDES permit effective date: N/A
NPDES permit expiration date: N/A
EPA has not retained enforcement authority.

C. LPDES permit - LPDES permit effective date: March 1, 2000
LPDES permit expiration date: February 28, 2005
Permit Modified: December 1, 2000

D. Date Application Received: August 30, 2004. Revised application received on December 6, 2004.

2. FACILITY INFORMATION

A. FACILITY TYPE/ACTIVITY - carbon black manufacturing facility

According to the application, Sid Richardson Carbon Co., Addis Plant manufactures carbon black using the furnace process.

There is no discharge of process wastewater or process area stormwater from the Sid Richardson Carbon Co., Addis Plant. Process wastewaters generated from the carbon black manufacturing process (including process area stormwater) are collected and recycled back to the plant for make-up water.

B. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: III
3. Wastewater Type: III
4. SIC code: 2895

C. LOCATION - 5221 Sid Richardson Road in Addis, West Baton Rouge Parish Latitude 30°19'48", Longitude 91°16'45"

3. OUTFALL INFORMATION

Outfall 001

Discharge Type: the discharge of treated sanitary wastewater.
Treatment: sanitary wastewaters are treated in a sewage plant with UV lighting (removes fecal coliform), then passes through an eco-basin (bio-remediation) and chlorination.
Location: at the point of discharge from the discharge pipe prior to combining with other waters, at Latitude 30°19'44", Longitude 91°16'42".
Flow: 0.002 MGD, estimated flow.
Discharge Route: Bayou Bourbeaux via local drainage, thence to Bayou Choctaw.

Outfall 002

Discharge Type: the intermittent discharge of uncontaminated stormwater runoff from the north area of the site and the north area of the landfill site.
Treatment: stormwater runoff passes through filter booms.
Location: at the point of discharge at the gate in the ditch north of the railroad tracks prior to combining with other waters, at Latitude 30°19'48", Longitude 91°16'43".
Flow: Intermittent.
Discharge Route: Bayou Bourbeaux via local drainage, thence to Bayou Choctaw.

Outfall 003

Discharge Type: the intermittent discharge of uncontaminated stormwater runoff from the north central area of the site.
Treatment: stormwater runoff passes through filter booms.
Location: at the point of discharge at the gate in the ditch south of the railroad tracks prior to combining with other waters, at Latitude 30°19'47", Longitude 91°16'42".
Flow: Intermittent.
Discharge Route: Bayou Bourbeaux via local drainage, thence to Bayou Choctaw.

Outfall 004

Discharge Type: the intermittent discharge of uncontaminated stormwater runoff from the south and west areas of the site, the south area of the landfill site, and previously monitored Outfall 005 discharges (during extreme rainfall events).
Treatment: stormwater runoff passes through filter booms.
Location: at the point of discharge at the gate in the ditch south of the ponds prior to combining with other waters, at Latitude 30°19'44", Longitude 91°16'52".
Flow: Intermittent.
Discharge Route: Bayou Bourbeaux via local drainage, thence to Bayou Choctaw.

Outfall 005

Discharge Type: intermittent discharge of process area stormwater and washwater.
Treatment: settlement, evaporation, and recycled back to the plant as make-up water.
Location: at the point of discharge from the pipe into the ditch south of the ponds prior to combining with other waters, at Latitude 30°19'44", Longitude 91°16'43".
Flow: Intermittent. Normally zero discharge unless excessive rainfall results in overflow to pond.
Discharge Route: Bayou Bourbeaux via local drainage, thence to Bayou Choctaw.

4. RECEIVING WATERS

STREAM - Bayou Bourbeaux via local drainage, thence to Bayou Choctaw

BASIN AND SEGMENT - Terrebonne Basin, Segment 120109

DESIGNATED USES -
a. primary contact recreation
b. secondary contact recreation
c. propagation of fish and wildlife

5. EXISTING EFFLUENT LIMITS

Outfall 001: the discharge of treated sanitary wastewater.

Parameter	Monthly Average	Weekly Average	Monitoring Frequency	Sample Type
Flow - MGD	---	Report	1/6 months	Estimate
BOD ₅	---	45 mg/L	1/6 months	Grab
TSS	--	45 mg/L	1/6 months	Grab
Fecal Coliform colonies/100ml	--	400	1/6 months	Grab
pH s.u.	6.0	9.0	1/6 months	Grab

Outfall(s) 002, 003, and 004: uncontaminated stormwater runoff.

Parameter	Monthly Average	Daily Maximum	Monitoring Frequency	Sample Type
Flow - MGD	---	Report	1/3 months	Estimate
TOC	---	50 mg/L	1/3 months	Grab
Oil & Grease	--	15 mg/L	1/3 months	Grab
TSS		Report mg/L	1/3 months	Grab
pH s.u.	6.0	9.0	1/3 months	Grab

Outfall 005: intermittent discharge of process area stormwater and washwater.

Parameter	Monthly Average	Daily Maximum	Monitoring Frequency	Sample Type
Flow - MGD	---	Report	1/month	Measure
TSS	---	70 mg/L	1/month	Grab
Oil & Grease	--	15 mg/L	1/month	Grab
TOC	--	75 mg/L	1/month	Grab
Turbidity, NTU	---	Report	1/month	Grab
pH s.u.	6.0	9.0	1/month	Grab

6. PROPOSED CHANGES FROM EXISTING LPDES PERMIT

Outfall(s) 002, 003, and 004 - The monitoring frequencies were changed from 1/3 months to 1/quarter in order to get Discharge Monitoring Reporting (DMR) on a calendar year.

Outfalls 006 and 007 were removed in the December 1, 2000 permit modification.

7. PROPOSED EFFLUENT LIMITS

Outfall 001: the discharge of treated sanitary wastewater.

Parameter	Monthly Average	Weekly Average	Monitoring Frequency	Sample Type	Regulatory Basis
Flow - MGD	---	Report	1/6 months	Estimate	LAC 33:IX.2707.I.1.b
BOD ₅	---	45 mg/L	1/6 months	Grab	BPJ; Current LPDES Permit; Class I Sanitary General Permit
TSS	--	45 mg/L	1/6 months	Grab	BPJ; Current LPDES Permit; Class I Sanitary General Permit
Fecal Coliform colonies/100ml	--	400	1/6 months	Grab	BPJ; Current LPDES Permit; Class I Sanitary General Permit
pH s.u.	6.0	9.0	1/6 months	Grab	BPJ; Current LPDES Permit; Class I Sanitary General Permit

Treatment: sanitary wastewaters are treated in a sewage plant with UV lighting (removes fecal coliform), then passes through an eco-basin (bio-remediation) and chlorination.

Monitoring Frequencies: A monitoring frequency of 1/6 months has been established for all parameters based on the current LPDES permit, Class I Sanitary General Permit, and BPJ. A sample type of estimate has been retained for Flow. A sample type of grab for BOD₅, TSS, Fecal Coliform, and pH has also been retained from the current LPDES permit.

Limitations: A report only requirement has been established for Flow. This was retained from the current LPDES permit. Weekly Average limitations of 45 mg/L for BOD₅, 45 mg/L for TSS, and 400 colonies/100 ml for Fecal Coliform have been established in this permit. PH shall remain between 6.0 and 9.0 standard units. All limitations were retained from the current LPDES permit and are consistent with the Class I Sanitary General Permit.

BPJ Best Professional Judgement
 s.u. Standard Units

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

Outfall(s) 002, 003, and 004: uncontaminated stormwater runoff.

Parameter	Monthly Average	Daily Maximum	Monitoring Frequency	Sample Type	Regulatory Basis
Flow - MGD	---	Report	1/quarter	Estimate	LAC 33:IX.2707.I.1.b
TOC	---	50 mg/L	1/quarter	Grab	BPJ; Current LPDES Permit; Current Guidance
Oil & Grease	--	15 mg/L	1/quarter	Grab	BPJ; Current LPDES Permit; Current Guidance
TSS		Report mg/L	1/quarter	Grab	BPJ; Current LPDES Permit
pH s.u.	6.0	9.0	1/quarter	Grab	BPJ; Current LPDES Permit; Current Guidance

Treatment: stormwater discharges are passed through a filter boom prior to discharge.

Monitoring Frequencies: A monitoring frequency of 1/quarter has been established for all parameters. The frequencies were changed from 1/3 months to 1/quarter in order to get Discharge Monitoring Reporting (DMR) on a calendar year. A sample type of estimate has been retained for Flow. A sample type of grab for TOC, Oil & Grease, TSS, and pH has also been retained from the current LPDES permit.

Limitations: A report only requirement has been established for Flow and TSS. These requirements were retained from the current LPDES permit. Daily Maximum limitations of 50 mg/L for TOC and 15 mg/L for Oil & Grease have been established in this permit. PH shall remain between 6.0 and 9.0 standard units. All limitations were retained from the current LPDES permit.

BPJ Best Professional Judgement
s.u. Standard Units

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

Outfall 005: intermittent discharge of process area stormwater and wastewater.

Parameter	Monthly Average	Daily Maximum	Monitoring Frequency	Sample Type	Regulatory Basis
Flow - MGD	---	Report	1/month	Measure	LAC 33:IX.2707.I.1.b
TSS	---	70 mg/L	1/month	Grab	BPJ; Current LPDES Permit
Oil & Grease	--	15 mg/L	1/month	Grab	BPJ; Current LPDES Permit
TOC	--	75 mg/L	1/month	Grab	BPJ; Current LPDES Permit
Turbidity, NTU	---	Report	1/month	Grab	BPJ; Current LPDES Permit
pH s.u.	6.0	9.0	1/month	Grab	BPJ; Current LPDES Permit

Treatment: process area stormwater and wastewater are collected via sumps and directed to Settling Pond #1 (West Pond). Water then flows into Settling Pond #2 (East Pond). Water is then pumped back into the facility as process make-up water. Water is NOT discharged unless necessitated by an extreme rainfall event.

Monitoring Frequencies: A monitoring frequency of 1/month has been established for all parameters based on the current LPDES permit. A sample type of measure has been retained for Flow. A sample type of grab for TSS, Oil & Grease, TOC, Turbidity, and pH has also been retained from the current LPDES permit.

Limitations: A report only requirement has been established for Flow and Turbidity. These requirements were retained from the current LPDES permit. Daily Maximum limitations of 70 mg/L for TSS, 15 mg/L for Oil & Grease, and 75 mg/L TOC have been established in this permit. PH shall remain between 6.0 and 9.0 standard units. All limitations were retained from the current LPDES permit.

BPJ Best Professional Judgement
 s.u. Standard Units

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

8. COMPLIANCE HISTORY/COMMENTS

A. Compliance History

A compliance history/DMR review was conducted covering the period of January 2003 through December 2005.

B. DMR Review/Excursions

<u>Date</u>	<u>Parameter</u>	<u>Outfall</u>	<u>Reported Value</u>	<u>Permit Limits</u>
NO EXCURSIONS REPORTED				

C. Inspections

A facility inspection conducted on April 11, 2005, found all areas to be satisfactory.

9. "IT" QUESTIONS - APPLICANT'S RESPONSES

Sid Richardson Carbon Co., Addis Plant is a minor facility with no major changes from the current LPDES permit, therefore, IT Questions were not required to be answered.

10. ENDANGERED SPECIES

The receiving waterbody, Subsegment 120109 of the Terrebonne Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated October 21, 2005 from Watson (FWS) to Gautreaux (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. It was determined that the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat.

11. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

12. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to a permit for the discharge described in the application.

the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

14. STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

In accordance with LAC 33:IX.2707.I.3 and LAC 33:IX.2707.I.4 [40 CFR 122.44(I)(3) and (4)], a Part II condition is proposed for applicability to all storm water discharges from the facility, either through permitted outfalls or through outfalls which are not listed in the permit or as sheet flow. The Part II condition requires a Storm Water Pollution Prevention Plan (SWP3) within six (6) months of the effective date of the final permit, along with other requirements. If the permittee maintains other plans that contain duplicative information, those plans could be incorporated by reference to the SWP3. Examples of these type plans include, but are not limited to: Spill Prevention Control and Countermeasures Plan (SPCC), Best Management Plan (BMP), Response Plans, etc. The conditions will be found in the draft permit. Including Best Management Practice (BMP) controls in the form of a SWP3 is consistent with other LPDES and EPA permits regulating similar discharges of stormwater associated with industrial activity, as defined in LAC 33:IX.2522.B.14 [40 CFR 122.26(b)(14)].

15. 303(d) WATERBODIES

Outfalls 001, 002, 003, 004, and 005 include discharges of stormwater runoff, treated sanitary wastewater, and process area wash water to the Bayou Bourbeaux via local drainage, thence to Bayou Choctaw, Subsegment 120109. Subsegment 120109 is listed on the Final 303(d) report as being impaired with pathogen indicators, organic enrichment/low DO, nutrients, and sulfates. A TMDL is scheduled to be completed by March 2007/2008.

Pathogen Indicators

To prevent further pathogen indicator impairments to the receiving stream, a weekly average limitation of 400 colonies/100 ml for fecal coliform has been established for the sanitary discharge at Outfall 001. This limitation has been retained from the current LPDES permit without increment and is consistent with the limitation established in the Class I Sanitary General Permit.

Outfalls 002, 003, 004, and 005 are mainly stormwater discharges and not reasonably expected to cause further pathogen indicator impairments to the receiving stream.

Organic Enrichment/low DO

To prevent further organic enrichment/low DO impairments to the receiving stream, a weekly average of 45 mg/L for BOD₅ has been established for the sanitary discharge at Outfall 001. This limitation has been retained from the current LPDES permit without increment and is consistent with the limitation established in the Class I Sanitary General Permit.

A daily maximum limitation of 50 mg/L for Total Organic Carbon (TOC) has been established for uncontaminated stormwater discharges at Outfalls 002, 003, and 004. These limitations have been retained from the current LPDES permit without increment and considered protective of waters of the state.

A daily maximum limitation of 75 mg/L for Total Organic Carbon (TOC) has been established for uncontaminated stormwater discharges at Outfalls 002, 003, and 004. This limitation has been retained from the current LPDES permit without increment and is considered protective of waters of the state.

Nutrients and Sulfates

The discharges from this facility are not reasonably expected to cause further nutrient or sulfate impairments in the receiving waterbody, therefore, no additional requirements were incorporated into this permit.